

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorneys for the Debtor(s)

In Re:

BRIAN AND LINDA BROPHY

Case No.: 16-34595

Judge: SLM

Chapter: 13

**APPLICATION FOR EXTENSION OR  
EARLY TERMINATION OF LOSS MITIGATION PERIOD**

The undersigned is the attorney for the debtors in this matter. On December 23, 2019, a Loss Mitigation Order was entered concerning:

Property: 52 Bartholf Avenue, Pompton Lakes, NJ 07442

Creditor: Queens Park Oval Trust (Roundpoint Mortgage Services)

The Loss Mitigation Period will expire on April 30, 2020.

For the reason(s) set forth below, the debtors hereby requests:

☒ An extension of the Loss Mitigation Period to May 27, 2020.

☐ Early termination of the Loss Mitigation Period, effective \_\_\_\_\_.

Set forth the applicant's reason(s) for the above request:

The debtors were previously offered a trial loan modification agreement and made all trial payments. The servicer disputes that one of the trial payments was submitted on time and is requesting updated financial information. The debtors are gathering documents to complete a new package, subject to their right to pursue the original trial offer. Preparations have been delayed due to debtors having to quarantine and from office closures as a result of COVID-19 and the debtors respectfully request an extension of loss mitigation in order to complete preparing the package.

☐ The parties to this matter, listed on the *Certification of Service* filed with this Application, consent to immediate entry of the order granting this Application. A *Certification Concerning Order to Be Submitted* has been filed with the Court.

☐ The parties to this matter, listed on the *Certification of Service* filed with this Application, do not consent to immediate entry of the order granting this application. (If the non-consenting party fails to file an objection to this Application within 7 days of the filed date of the Application, which objection must be served on all Loss Mitigation parties, the Court may grant the relief requested.)

☒ Consent has not been requested.

Dated: April 17, 2020

/s/ David G. Beslow, Esq.  
Applicant's signature